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continued on next page]*

*Attorneys for Defendants Redwood Capital
Management, LLC, Redwood Master Fund,
Ltd, Redwood Opportunity Master Fund, Ltd,
Manuel 2018, LLC, Ginogerum, LLC, and
White-Hathaway Opportunity Fund, LLC*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

K.A.,

Plaintiff,

vs.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign
entity; MINDGEEK USA
INCORPORATED, a Delaware
corporation; MG PREMIUM LTD, a
foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
a foreign entity; BERND BERGMAIR,
a foreign individual; FERAS ANTOON,
a foreign individual; DAVID
TASSILLO, a foreign individual; VISA
INC., a Delaware corporation;
REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware

CASE NO. 2:24-cv-04786-WLH-ADS
**REDWOOD DEFENDANTS'
NOTICE OF FILING IN RELATED
CASE**

1 limited liability company; REDWOOD
2 DOE FUNDS 1-7; COLBECK
3 CAPITAL MANAGEMENT, LLC, a
4 Delaware company, COLBECK DOE
5 FUNDS 1-3,

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Defendants.

1 *[Additional Counsel for Defendant continued from caption page]*

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1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to the Court's Order granting leave
3 for each Defendant to file by March 21, 2025 a supplemental brief of 10 pages or less
4 on any issue relating to the Defendant's Motion to Dismiss, and Order Granting Joint
5 Stipulation to Request Limited Coordination for Purposes of Responding to
6 Complaints in Related Cases, on March 21, 2025, Defendants Redwood Capital
7 Management, LLC, Redwood Master Fund, Ltd., Redwood Opportunity Master Fund,
8 Manuel 2018, LLC, Ginogerum, LLC, and White-Hathaway Opportunity Fund, LLC
9 (collectively, "Redwood") have filed in *Fleites v. MindGeek S.à.r.l., et al.*, No. 2:21-
10 cv-4920-WLH-ADS (C.D. Cal. 2021) (the "*Fleites* Action") Supplemental Briefing
11 in Support of its Motions to Dismiss Plaintiffs' Complaints (and supporting
12 documents) in the *Fleites* Action and each of the following related 14 actions pending
13 before this Court (the "Related Actions"):

- 14 a. *K.A. v. MindGeek, S.à.r.l., et al.*, No. 2:24-cv-04786-WLH-ADS
15 (C.D. Cal. June 7, 2024);
 - 16 b. *N.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04788-WLH-ADS
17 (C.D. Cal. June 7, 2024);
 - 18 c. *L.T. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04791-WLH-ADS
19 (C.D. Cal. June 7, 2024);
 - 20 d. *T.C. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04795-WLH-ADS
21 (C.D. Cal. June 7, 2024);
 - 22 e. *X.N. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04800-WLH-ADS
23 (C.D. Cal. June 7, 2024);
 - 24 f. *N.Y. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04801-WLH-ADS
25 (C.D. Cal. June 7, 2024);
 - 26 g. *J.C. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04971-WLH-ADS
27 (C.D. Cal. June 12, 2024);
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- 1 h. *W.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04977-WLH-ADS
2 (C.D. Cal. June 13, 2024);
3 i. *C.S. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04992-WLH-ADS
4 (C.D. Cal. June 13, 2024);
5 j. *S.O. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04998-WLH-ADS
6 (C.D. Cal. June 13, 2024);
7 k. *L.S. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05026-WLH-ADS
8 (C.D. Cal. June 14, 2024);
9 l. *W.P. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05185-WLH-ADS
10 (C.D. Cal. June 20, 2024);
11 m. *A.K. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05190-WLH-ADS
12 (C.D. Cal. June 20, 2024); and
13 n. *J.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-07046-WLH-ADS
14 (C.D. Cal. June 20, 2024).

15 Redwood's Supplemental Briefing includes arguments and bases to dismiss
16 the near facsimile claims for conspiracy to violate federal sex-trafficking laws (18
17 U.S.C. §§ 1591, 1594, and 1595) asserted by the Plaintiffs in the *Fleites* Action and
18 the Related Actions pursuant to Rule 12(b)(6) of the Federal Rules of Civil
19 Procedure.

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21 DATED: March 21, 2025

PAUL HASTINGS LLP

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23 By: /s/ James M. Pearl

JAMES M. PEARL

24 *Attorneys for Defendants Redwood*
25 *Capital Management, LLC, Redwood*
26 *Master Fund, Ltd, Redwood Opportunity*
27 *Master Fund, Ltd, Manuel 2018, LLC,*
28 *Ginogerum, LLC, and White-Hathaway*
Opportunity Fund, LLC